

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Jonathan David McCoy,	)	C/A No.:5:10-cv-00132-JFA
	)	
Plaintiff,	)	
	)	
vs.	)	<b>PROPOSED VOIR DIRE ON</b>
	)	<b>BEHALF OF DEFENDANT</b>
	)	<b>CITY OF COLUMBIA</b>
City of Columbia, John K. Passmore, James )		
Heywood and Amanda H. Long, all in their )		
individual capacities,	)	
	)	
Defendants.	)	

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*I have examined the court's standard juror questionnaires and believe the attached proposed voir dire does not duplicate these questionnaires or the court's standard inquiries as set forth in Judge Anderson's SPECIAL INSTRUCTIONS. I believe the following questions are reasonable necessary for selection of an impartial jury.*

1. Has any juror or family member had a significant experience or event dealing with the City of Columbia, its police department, or officers within the police department? What was the experience or event? Would this experience or event affect your ability to be impartial to all parties?

2. Does any juror or any member of their immediate family suffer from PTSD (post-traumatic stress disorder) or depression, whether either has been diagnosed or not? Would this affect your ability to be impartial to the City or to a person claiming he or she suffered from PTSD or depression? Would this cause you to be sympathetic to a person claiming to suffer from PTSD or depression?

3. Does any member of the jury panel have any knowledge or information concerning an alleged suicide that occurred at the Alvin S. Glenn Detention Center on October 17, 2009, where the victim was identified as Olin Taylor, II? Would this affect your ability to be impartial to all parties in this case?

4. Would the fact that this case may include testimony about an alleged suicide of a third party that occurred at the Alvin S. Glenn Detention Center on October 17, 2009, affect your ability to be impartial to all parties in this case, where it is not alleged that the City caused or contributed to the alleged suicide?

5. This case will include evidence concerning the arrest of an individual in the Five Points area of Columbia. Does any member of the jury panel frequent any business or establishment in the Five Points area of Columbia? What business or establishment? Would your experience as a frequent patron of any business or establishment in Five Points make you favor one side or the other in this case?

s/ Peter M. Balthazor  
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Columbia, South Carolina  
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